

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEFANO GRANATA, CAMERON PROSPERI,
THE GUN RUNNER, LLC, AND FIREARMS
POLICY COALITION, INC.,

Plaintiffs,

v.

ANDREA JOY CAMPBELL, IN HER OFFICIAL
CAPACITY AS ATTORNEY GENERAL OF THE
COMMONWEALTH OF MASSACHUSETTS,
AND TERRENCE M. REIDY, IN HIS OFFICIAL
CAPACITY AS SECRETARY OF THE
EXECUTIVE OFFICE OF PUBLIC SAFETY
AND SECURITY OF THE COMMONWEALTH
OF MASSACHUSETTS,

Defendants.

CIVIL ACTION
NO. 1:21-cv-10960-DJC

**Leave to file allowed on March 13,
2025**

**SECOND DECLARATION OF PETER LUCIER IN SUPPORT OF
DEFENDANTS' CROSS-MOTION FOR SUMMARY JUDGMENT**

Peter Lucier, pursuant to 28 U.S.C. § 1746, hereby declares as follows:

1. The evidence set out in the foregoing declaration is based on my personal knowledge.

2. I am a veteran of the United States Marine Corps and a former Marine Corps firearms instructor. I hold a Juris Doctor from Saint Louis University. My current and past work involves using and teaching others about firearms as well as consulting about firearms. The Massachusetts Attorney General's Office retained me as a consultant to review handguns on the

Massachusetts Approved Firearms Roster¹ for compliance with the Attorney General's Handgun Sales Regulations.²

3. I reviewed the handguns on the roster for compliance with the Attorney General's Handgun Sales Regulations by (1) reviewing materials including specifications, manuals, publicly-available test results, and other documentation as necessary and (2) physically reviewing handguns as needed to resolve any questions remaining after documentary review.

4. Based on my review of 1,160 handgun models on the Approved Firearms Roster, with the current information available, and consistent with the Attorney General's July 16, 2004, Consumer Advisory on Glock Handguns,³ at least 1,029 handgun models on the Approved Firearms Roster also comply with the Attorney General's Handgun Sales Regulations.

I declare under penalty of perjury that the foregoing is true and correct. Executed on March 12, 2025.

/s/ Peter Lucier
Peter Lucier

¹ I reviewed Approved Firearms Roster as of June 2024. Since June 2024, another 14 handgun models have been added to the Approved Firearms Roster.

² 940 Mass. Code Regs. §§ 16.00 *et seq.*

³ Available at <https://www.mass.gov/files/documents/2016/12/wg/ag-handgun-regulation-enforcement-notice.pdf>

CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be sent electronically to registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 13, 2025.

/s/ Phoebe Fischer-Groban
Phoebe Fischer-Groban
Assistant Attorney General